

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
<p>BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com <i>Proposed Counsel for the Official Committee of Unsecured Creditors</i> -and- GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKinoian@genovaburns.com <i>Proposed Local Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>BROWN RUDNICK LLP Stephen D. Palley, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (202) 536-1700 Fax: (202) 536-1701 Email: spalley@brownrudnick.com</p>
<p>In re:</p> <p>BLOCKFI INC., <i>et al.</i>,</p> <p style="text-align: right;">Debtors.</p>	<p>Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered)</p> <p>Hearing: January 27, 2023 at 9:00 a.m.</p>

APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**,” the “**Company**,” or “**BlockFi**”), by and through its proposed counsel, having filed substantially contemporaneously with this Application the *Motion of the Official Committee of Unsecured Creditors to Seal the Redacted Portions of the Declaration of Moshin Meghji of M3*

Partners [Docket No. 363] and Granting Related Relief (the “**Meghji Declaration**”) [Docket No. 363] pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”), hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Scheduling Order**”), for the reasons set forth below:

1. Prior to the filing of the Motion to Seal, the Committee filed a redacted version of Meghji Declaration,¹ in further support of (i) the Committee’s initial objection filed on January 13, 2023 (the “**Initial KERP Objection**”) [Docket No. 280] and supplemental objection filed on January 17, 2023 (the “**Supplemental KERP Objection**”) [Docket No. 310], to the *Debtors’ Motion for Entry of an Order (I) Approving the Debtors’ Retention Programs and (II) Granting Related Relief* [Docket No. 21-1] (the “**KERP Motion**”) filed November 28, 2022, and (ii) the Committee’s objection filed on January 13, 2023 (the “**Moelis Objection**”) [Docket No. 279] to the *Application of the Debtors and Debtors in Possession for Entry of an Order Authorizing the Retention and Employment of Moelis & Company LLC as Investment Banker, Capital Markets Advisor, and Financial Advisor Effective as of the Petition Date* (the “**Moelis Application**”) [Docket No. 139] filed on December 23, 2022. **The return date on the Debtor’s KERP Motion and Moelis Application is currently scheduled for January 27, 2023 at 9:00 a.m.**

2. As set forth in the Motion to Seal, the redacted portions of the Meghji Declaration include “trade secret[s] or confidential research, development, or commercial information,” as set forth in Bankruptcy Code Section 107(b) (*see also* Fed. R. Bankr. P. 9018). The redacted

¹ The redacted version of the Meghji Declaration [Docket No. 363] was filed prior to the filing of this Motion to Seal. An unredacted version of the Supplemental Objection is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](https://www.uscourts.gov/Process-to-Electronically-Request-that-a-Document-be-Sealed)).

information includes, generally, analysis from Committee professionals based off of data the Debtors' professionals provided during confidential meet and confers with the Committee and their professionals. The Committee committed to protecting this information as confidential in good faith.

3. By this Application, the Committee respectfully requests that, in accordance with this Court's [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](#), the hearing on the Motion to Seal be scheduled on the same date and time as the current return date on the Debtor's KERP Motion and Moelis Application, which is January 27, 2023 at 9:00 a.m.

4. Please be advised that the Committee's Supplemental KERP Objection [Docket No. 310] was also filed with redactions based on the same sources of Confidential Information. A similar motion to seal was filed with respect to the Supplemental KERP Objection [Docket No. 311] on January 17, 2023, which motion is still pending and is currently scheduled to be heard on January 27, 2023 at 9:00 a.m. contemporaneously with the Debtor's KERP Motion, the Committee's Initial KERP Objection and the Supplemental KERP Objection (among other matters)

5. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: January 24, 2023

GENOVA BURNS LLC

By: /s/ Donald W. Clarke

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